

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LISA COOLEY, LLC,

Plaintiff,

v.

THE NATIVE, S.A.,

Defendant.

No. 20-cv-5800 (VEC)

**DECLARATION OF
RONALD ADELMAN**

RONALD ADELMAN, under penalty of perjury, declares as follows:

1. I am Counsel to Stropheus LLC, and I represent the Plaintiff in this action. I make this declaration for the purpose of submitting true and correct copies of the following documents, all of which I personally accessed from the internet after the Defendant filed its motion to dismiss (Dkt. 26) in this action.

- Exhibit 1. The “Contacts” page from the website of The Native: <https://thenative.ch/contacts>. Accessed on December 28, 2020.
- Exhibit 2. Press Release, *The Native SA Reports Preliminary Half–Year Results, Reduces Debt and Opens New Corporate Headquarters in New York*. Dated July 17, 2018 and accessed on December 21, 2020 from https://thenative.ch/wp-content/uploads/2018/07/The_Native_SA_Reports_Preliminary_First_Half_Results.pdf.
- Exhibit 3. Sublease between Lisa Cooley, LLC and P8H, Inc., dated as of March 13, 2018.
- Exhibit 4. Guaranty executed by The Native on March 13, 2018.
- Exhibit 5. Press release, *PADDLE8 KICKS-OFF THE FALL SEASON WITH NEW HIGH-PROFILE AUCTIONS*. Dated August 13, 2019 and accessed on December 22, 2020 from https://thenative.ch/wp-content/uploads/2019/08/Paddle8_Corporate_Announcement_08132019.pdf.

- Exhibit 6. Article from *The New York Times* dated January 23, 2018 and titled *Paddle8, Online Art Auctioneer, Is Merging With Swiss Tech Company*. Accessed on December 21, 2020
- Exhibit 7. Press release, *PADDLE8 AND THE NATIVE ANNOUNCE LAUNCH OF P8PASS, A BLOCKCHAIN ART AUTHENTICATION SERVICE*, Dated May 3, 2018 and accessed on December 21, 2020 from <https://thenative.ch/wp-content/uploads/2018/05/P8Pass-Release-FINAL-4.pdf>.
- Exhibit 8. Article from the *Robb Report* dated December 21, 2018, titled *Paddle8's Izabela Depczyk on the Auction House of the Future*. Accessed on December 28, 2020 from <https://robbreport.com/muse/discoveries/paddle8s-izabela-depczyk-auction-house-of-the-future-2836237/>
- Exhibit 9. Press Release, *Paddle8's Partnership with The Native Puts the Company on Growth Trajectory, with a Clear Path to Profitability in 2018, by Reengaging Key Clients, Cultivating New Gen Z Collectors, and Enhancing Its Technological Toolkit*. Dated November 2, 2018 and accessed on December 21, 2020 from <https://thenative.ch/wp-content/uploads/2018/11/The Native and Paddle8 announcement 02112018.pdf>
- Exhibit 10. Press Release, *The Native SA Agrees New Terms [sic] for P8H Inc. Options*. Dated May 9, 2018 and accessed on January 11, 2021 from https://thenative.ch/wp-content/uploads/2018/05/The-Native-SA-Agrees-New-Terms-for-P8H-Inc-Options_id.pdf.

Dated: New York, New York
January 11, 2021

s/Ronald Adelman
Ronald Adelman